



CONTINUITY
SHIPPER'S
ASSOCIATION

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

September 23, 1999

Postal Rate Commission
1333 H Street, NW
Washington, DC 20268-0001

Re: Docket No. C99-4; Charges for the Bulk Parcel Return Service

Dear Postal Rate Commission:

Below is the Continuity Shippers Association's statement on the amount of time it will require to develop and file a direct case in this proceeding as required in the Commission's order of September 3, 1999.

On September 16, 1999, the Postal Service provided revised figures for the October 1998 BPRS cost study. The revised figures show that the attributable cost for each BPRS parcel was \$1.039 for 1998.

For purposes of this complaint case only, the CSA accepts the \$1.039 attributable cost figure for 1998. The CSA proposes using the Consumer Price Index-Urban (CPIU) as the cost forward factor for the years 1999 and 2000. The twelve month average for the CPIU ending August 1999 is 2.3%. This yields an attributable cost for BPRS of \$1.063 for 1999, and \$1.087 or \$1.09 for 2000. Given this proposal, the CSA does not believe testimony is required on the cost forward factor. The CSA reserves the right to challenge the attributable cost and the cost forward factor in other proceedings.

The CSA informed the Postal Service that it would stipulate to a \$1.09 attributable cost figure for 2000, and explained the proposed cost forward factor. The Postal Service **said** it would respond within the context of the complaint proceeding.

The other remaining issue is the appropriate cost coverage for BPRS. The CSA **believes** that the issue of the cost coverage **is** a judgmental or legal issue that does not require testimony at this time. Thus, the CSA proposes that the entire case be presented on briefs from the **parties**.

The CSA proposes the following schedule: The CSA will file its brief by October 1, 1999; **and** the Postal Service (and interested parties) shall file briefs within 14 days, by October **15**.

Very truly yours,

Aaron Horowitz
Attorney for the
Continuity Shippers Association

CERTIFICATE OF SERVICE

This will certify that the foregoing Statement was served on September 23, 1999, by first class mail, on the following:

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